

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SHELL CHEMICAL LP
SHELL NORCO CHEMICAL PLANT-EAST SITE
PROPOSED PART 70 AIR OPERATING PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Proposed Part 70 Air Operating Permit for Shell Chemical LP, Shell Norco Chemical Plant-East Site, P. O. Box 10, Norco, Louisiana 70075 for the Gasoline Hydrotreater Unit (GHT). **The facility is located at 15536 River Road, Norco, St. Charles Parish.**

Shell Norco Chemical Plant-East Site requested to incorporate the GHT Project to meet the Environmental Protection Agency (EPA) Mobile Source Air Toxics (MSAT) Phase 2 final rule requirements dated February 9, 2007. This rule will limit the benzene content of the gasoline produced at the facility to an annual average of 0.62 percent by volume..

This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.

In order to achieve this goal the GHT Project will be completed in two phases. The first phase will be to startup the Depentanizer column and the second phase will be to startup an existing distillation column with associated modifications. The GHT Unit will be modified as follows along with other necessary changes:

1. Reformate routed from Motiva Enterprises LLC, Norco Refinery, will be directly used as feed for the GHT Unit's Depentanizer Column instead of pyrolysis gasoline;
2. The Aromatics Stripper feed tray will be relocated to tray 11 and given a new feed nozzle and new feed distributor;
3. New piping will be installed to re-arrange the existing fractionation columns, vessels, pumps, and heat exchangers;
4. One new on-line analyzer will be installed to ensure product specifications;
5. Existing instrumentation and controls will be updated to meet the new process configuration;
6. Existing tanks will be utilized for storage after necessary changes in piping and fugitive components;
7. Two tanks, F-503 and F-509, along with other pumps, compressors, reactors, distillation column, process vessels, air coolers, and heat exchangers will be taken out of service (idled); and
8. Incorporate the GHT Sampling Project approved under a Small Source Exemption dated November 8, 2007.

In addition, the facility is proposing to permit the GHT Unit separately by removing the associated equipment from Olefins Plant Permit No. 2520-V2 dated October 23, 2001, and adding some equipment from the Pyrolysis Gasoline Project Permit No. 2840-V0 dated May 30, 2003. A separate stand alone permit for GHT Unit will enhance the facility's operational flexibility to comply with the EPA regulations as referenced above. The equipment with associated emissions included in this permit shall be removed from the above referenced permits (modification).

The GHT Project impacts other Shell emissions sources currently permitted under Permit No. 2520-V2 dated October 23, 2001. The emission sources are OL-5 Furnaces (Emission Points 14-76 and 16-76), GO-1 Furnaces

(Emission Points 8-73 and 9-73), other tanks, and fugitive emissions. Under the New Source Review a netting analysis was undertaken based on Prevention of Significant Deterioration (PSD) regulations which utilizes a baseline actual to potential emissions analysis, projected actual emissions analysis, and includes the amount of emissions excluded which could have been accommodated consistent with the requirements of LAC 33:III.509.R.6.a.iii. In addition, the existing potential to emit has been based on the Global Settlement between State of Louisiana, Department of Environmental Quality and Shell Chemical LP (Norco, St. Rose, Geismar and Taft Sites); Settlement Tracking No. SA-AWE-06-0052, Section III.B – Air Permit Noncompliance Self-Reported By Respondent dated May 7, 2007.

The following table represents the netting analysis based on 2006 and 2007:

<u>Pollutant</u>	<u>Baseline Emission</u>	<u>Existing Potential to Emit</u>	<u>Could Have Been Accommodated</u>	<u>Projected Actual Emissions</u>	<u>Emission Increase</u>
PM ₁₀	28.01	67.06	10.31	38.32	-
SO ₂	0.68	59.84	30.32	31.00	-
NO _X	522.94	2099.26	192.42	715.36	-
CO	52.29	162.38	19.23	71.52	-
VOC	48.80	450.45	95.55	169.32	+ 24.97

The other emission source which will have an impact is the OL-5 Ground Flare (Emission Point 7-84). This is a control device with the baseline emissions and that could have been accommodated emissions are based on the global settlement referenced above. The netting analysis determined that the emission increase due to the GHT Project from the flare are PM₁₀, 0.12 tons per year (TPY); NO_X, 0.61 TPY; CO, 3.35 TPY; and VOC, 3.85 (total 28.83) TPY. The overall emission increases from the GHT Project are insignificant for all criteria pollutants; therefore, PSD review is not required. This permit modification constitutes a “Title I Modification”.

Estimated emissions in tons per year are as follows from the GHT Unit associated equipment including the equipment transferred from Permit No. 2840-V0:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	-	-	-
SO ₂	-	-	-
NO _X	-	-	-
CO	-	-	-
VOC	240.51	130.48	- 110.03

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the “Worksheet for Technical Review of Working Draft of Proposed Permit”. All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, August 20, 2009.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permit and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at St. Charles Parish Library – Norco, 197 Good Hope, Norco, LA 70079.

Inquiries or requests for additional information regarding this permit action should be directed to Syed Quadri, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3123.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 26336, Permit Number 3078-V0, and Activity Number PER20090003.

Scheduled for publication: Thursday, July 16, 2009

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090003
Agency Interest No. 26336

Hermie L. Bundick
General Manager – Norco Manufacturing Chemicals
Shell Norco Chemical Plant – East Site
P. O. Box 10
Norco, Louisiana 70079

RE: Part 70 Operating Permit Modification, Gasoline Hydrotreater Unit, Shell Chemical LP - Norco Chemical Plant - East Site, Shell Chemical LP, Norco St. Charles Parish, Louisiana

Dear Mr. Hermie L. Bundick:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2009.

Permit No.: 3078-V0

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

SGQ
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Shell Chemical LP - Norco Chemical Plant - East Site

Gasoline Hydrotreater Unit

Agency Interest No.: 26336

Shell Chemical LP

Norco, St. Charles Parish, Louisiana

I. Background

Shell Chemical LP, Norco Chemical Plant – East Site, owns and operates a chemical manufacturing facility in Norco, St. Charles Parish, Louisiana. Historically, the Shell Norco East Site was comprised of the Shell Norco Refining Company and Shell Chemical Company. In 1998, Shell Oil Company, Texaco Inc., and Saudi Aramco formed Motiva Enterprises LLC, a joint venture combining major elements of the three companies' eastern and Gulf Coast refining and marketing businesses. With the formation of Motiva, the Norco Chemical Plant – East Site is now owned by the Shell Chemical LP.

Shell Chemical LP, Norco Chemical Plant - East Site, an existing chemical facility currently operates the Gasoline Hydrotreater (GHT) Unit under Part 70 Permit No. 2520-V2 dated October 23, 2001 and Permit No. 2840-V0 dated May 30, 2003, along with other units.

II. Origin

A permit application and Emission Inventory Questionnaire (EIQ) dated March 25, 2009, were submitted requesting a separate permit for the Gasoline Hydrotreater Unit with changes to the current operation. Additional information was also submitted as of June 15, 2009.

III. Description

Gasoline Hydrotreater (GHT): Pyrolysis gasoline from Gasoline Olefins (GO-1) and Olefins Plant (OL-5) and imported pyrolysis gasoline is fed to this hydrotreater to remove dienes, acetylenes, styrene, and sulfur compounds. The unit also separates hydrotreated pyrolysis gasoline into benzene concentrate, an unhydrotreated C₅ stream, and heavy gasoline products. This unit consists of two catalytic stages. The first stage removes dienes, acetylenes, and styrene compounds. The second stage removes sulfur and olefins compounds from the benzene concentrate.

The facility is now proposing GHT Project to meet the Environmental Protection Agency (EPA) Mobile Source Air Toxics (MSAT) Phase 2 final rule requirements dated February 9, 2007. This rule will limit the benzene content of the gasoline produced at the facility to an annual average of 0.62 percent by volume.

With this proposal the GHT Unit will fractionate reformatte in the Depentanizer column into a low benzene C₅/C₇+ and a C₅/C₆/C₇ side draw. The low benzene C₅/C₇+ stream will be routed back to Motiva Enterprises LLC. The C₅/C₆/C₇ side draw product stream which is not sent back to Motiva Enterprises LLC will be routed to a second column and fractionated into a

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low benzene C5 gasoline and a concentrated benzene C6/C7 product. The low benzene C5 gasoline stream will be cooled and pumped back to Motiva Enterprises LLC and the concentrated benzene C6/C7 will be cooled and stored in tanks prior to being shipped offsite. The C5/C6/C7 side draw or the concentrated benzene C6/C7 bottoms product may also be used as fuel in the Olefin Furnaces.

In order to achieve this goal the GHT Project will be completed in two phases. The first phase will be to startup the Depentanizer column and the second phase will be to startup an existing distillation column with associated modifications. The GHT Unit will be modified as follows along with other necessary changes:

1. Reformate routed from Motiva will be directly used as feed for the GHT Unit's Depentanizer Column instead of pyrolysis gasoline;
2. The Aromatics Stripper feed tray will be relocated to tray 11 and given a new feed nozzle and new feed distributor;
3. New piping will be installed to re-arrange the existing fractionation columns, vessels, pumps, and heat exchangers;
4. One new on-line analyzer will be installed to ensure product specifications;
5. Existing instrumentation and controls will be updated to meet the new process configuration;
6. Existing tanks will be utilized for storage after necessary changes in piping and fugitive components;
7. Two tanks, F-503 and F-509, along with other pumps, compressors, reactors, distillation column, process vessels, air coolers, and heat exchangers will be taken out of service (idled); and
8. Incorporate the GHT Sampling Project approved under a Small Source Exemption dated November 8, 2007.

In addition, the facility is proposing to permit the GHT Unit separately by removing the associated equipment from Olefins Plant Permit No. 2520-V2 dated October 23, 2001, and adding some equipment from the Pyrolysis Gasoline Project Permit No. 2840-V0 dated May 30, 2003. A separate stand alone permit for GHT Unit will enhance the facility's operational flexibility to comply with the EPA regulations as referenced above. The equipment with associated emissions included in this permit shall be removed from the above referenced permits (modification).

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Shell Chemical LP - Norco Chemical Plant - East Site

Gasoline Hydrotreater Unit

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Shell Chemical LP

Norco, St. Charles Parish, Louisiana

The GHT Project impacts other Shell emissions sources currently permitted under Permit No. 2520-V2 dated October 23, 2001. The emission sources are OL-5 Furnaces (Emission Points 14-76 and 16-76), GO-1 Furnaces (Emission Points 8-73 and 9-73), other tanks, and fugitive emissions. Under the New Source Review a netting analysis was undertaken based on Prevention of Significant Deterioration (PSD) regulations which utilizes a baseline actual to potential emissions analysis, projected actual emissions analysis, and includes the amount of emissions excluded which could have been accommodated consistent with the requirements of LAC 33:III.509.R.6.a.iii. In addition, the existing potential to emit has been based on the Global Settlement between State of Louisiana, Department of Environmental Quality and Shell Chemical LP (Norco, St. Rose, Geismar and Taft Sites); Settlement Tracking No. SA-AWE-06-0052, Section III.B – Air Permit Noncompliance Self-Reported By Respondent dated May 7, 2007.

The following table represents the netting analysis based on 2006 and 2007:

<u>Pollutant</u>	<u>Baseline Emission</u>	<u>Existing Potential to Emit</u>	<u>Could Have Been Accommodated</u>	<u>Projected Actual Emissions</u>	<u>Emission Increase</u>
PM ₁₀	28.01	67.06	10.31	38.32	-
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The other emission source which will have an impact is the OL-5 Ground Flare (Emission Point 7-84). This is a control device with the baseline emissions and that could have been accommodated emissions are based on the global settlement referenced above. The netting analysis determined that the emission increase from the flare are PM₁₀, 0.12 tons per year (TPY); NO_x, 0.61 TPY; CO, 3.35 TPY; and VOC, 3.85 (total 28.83) TPY. The overall emission increases from the GHT Project are insignificant for all criteria pollutants; therefore, PSD review is not required.

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Shell Chemical LP - Norco Chemical Plant - East Site

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Shell Chemical LP

Norco, St. Charles Parish, Louisiana

Estimated emissions in tons per year are as follows from the GHT Unit associated equipment including the equipment transferred from Permit No. 2840-V0:

Pollutant	Before	After	Change
PM ₁₀	-	-	-
SO ₂	-	-	-
NO _X	-	-	-
CO	-	-	-
VOC **	240.51	130.48	- 110.03

**** VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After
1,3-Butadiene	*	1.25
1-Methylnaphthalene	*	<0.01
2,2,4-Trimethylpentane	-	0.02
2-Methylnaphthalene	*	0.02
Acetaldehyde	*	0.03
Benzene	*	18.98
Biphenyl	*	<0.01
Cresol	*	<0.01
Cumene	*	<0.01
Ethyl benzene	*	2.11
Methanol	*	<0.01
Methyl tertiary butyl ether	*	<0.01
n-Hexane	*	3.97
Naphthalene	*	0.04
Phenol	*	<0.01
Polynuclear Aromatic Hydrocarbons	*	<0.001
Styrene	*	0.74

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Shell Chemical LP

Norco, St. Charles Parish, Louisiana

**** VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After
Toluene	*	8.98
Xylene (mixed isomers)	*	2.97
Total	*	39.15
Other VOC (TPY):		91.33

Non VOC Toxic Air Pollutants (TAPs)

Ammonia	*	0.19
Hydrogen sulfide	*	0.02
Total		0.21

* Part of the overall speciation in Permit No. 2520-V2 dated October 23, 2001. No toxic air pollutant change is greater than its minimum emission rate (MER).

The "After" include the tank cleaning VOC emissions (20.57 tons per year) which were permitted under variances in the past. These emissions are a part of operating stationary sources and should be regulated and appropriately controlled. Many rules and regulations acknowledge and recognize that tank cleaning emissions are exempt from certain technology based limitations and must be controlled with good air pollution control practices to minimize these emissions during tank cleaning. Permitting tank cleaning emissions will be beneficial to air quality and will greatly assist in air quality planning purposes by requiring that these emissions be clearly identified, quantified, and limited where necessary through out the facility. The tank cleaning emissions are not subject to New Source Review as they are existing emissions and no new modifications (new source or change in the method of operation) are triggering an increase in the associated emissions.

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility as a whole is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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Shell Chemical LP - Norco Chemical Plant - East Site

Gasoline Hydrotreater Unit

Agency Interest No.: 26336

Shell Chemical LP

Norco, St. Charles Parish, Louisiana

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit (Title I Modification) was published in The Advocate, Baton Rouge, Louisiana and St. Charles Herald-Guide, Louisiana, on July **, 2009. Written and oral comments received during the comment period from the general public and organizations will be considered before issuing the permit. Copies of the public notice were mailed out to individuals on the mailing list maintained by Office of Environmental Services on July **, 2009. The proposed permit was sent to U.S. EPA via e-mail on July **, 2009. All comments received shall be considered before an action is taken on this proposed permit.

VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
NA			

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Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

VIII. General Condition XVII Activities

Work Activity	Schedule	PM ₁₀	Emission Rates - tons			
			SO ₂	NO _X	CO	VOC
NA						

IX. Insignificant Activities

ID No.:	Description	Citation
IA-2154	Storage Tank	LAC 33:III.501.B.5.A.3
IA-2215	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.3
IA-2218	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.3
IA-2220	K-538 Antioxidant Storage Tank	LAC 33:III.501.B.5.A.3
IA-2221	PV-2060 GHT Unit Tank	LAC 33:III.501.B.5.A.3
IA-2232	Sampling Losses and Control Room Lab Vents	LAC 33:III.501.B.5.A.6
IA-2236	Miscellaneous On-Line Analyzer Vents	LAC 33:III.501.B.5.A.9
IA-2130	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2131	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2132	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2138	TK-104 Soap Tank	LAC 33:III.501.B.5.A.10
IA-2171	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2214	GHT Unit Storage Tank	LAC 33:III.501.B.5.A.10
IA-2216	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2217	S.S. Portafeed Process Additive Tank	LAC 33:III.501.B.5.A.10
IA-2219	N82124 Nalco Storage Tank	LAC 33:III.501.B.5.A.10
IA-2238	Catalyst/Dessicant Changeouts GHT Unit	LAC 33:III.501.B.5.A.11

Shell Chemical LP - Norco Chemical Plant - East Site
 Gasoline Hydrotreater Unit
 Agency Interest No.: 26336
 Shell Chemical LP
 Norco, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																
		5	9	11	13	15	2103	2104	2111	2113	2115	2121	2141	2301	29	51	52	56
UNF004	Gasoline Hydrotreater Unit																	
ARE004	3205-95, Wastewater Emission																	
EQT252	3-95, EFR Storage Tank F-495																	
EQT253	1001-95, IFR Storage Tank F-491																	
EQT254	1002-95, EFR Storage Tank F-509																	
EQT255	1233-95, EFR Storage Tank F-503																	
EQT256	1252-95, EFR Storage Tank F-502																	
EQT257	5040-09, GHT Tank Turnaround Emissions																	
EQT258	CNTLVENT 27, Aromatic Splitter Vent																	
EQT259	CNTLVENT 380, Feed Surge Drum Vent PV-2031																	
EQT260	CNTLVENT 382, SW Drum Vent PV-2055																	
EQT261	CNTLVENT 386, Compressors Vent (Aromatic) K-5432A&B																	
EQT262	CNTLVENT 424, Compressors 1 st Stage Vent K-5431A&B																	
EQT263	CNTLVENT Compressors Vent (Heavy Gasoline) K-5432A&B																	
EQT264	CNTLVENT 541, Miscellaneous Maintenance																	
EQT265	CNTLVENT 552, 2 nd Stage Aromatic Reactor Swap/Catalyst Change Out																	

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Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter																
		5	9	11	13	15	2103	2104	2111	2113	2115	2121	2141	2301	29	51	52	56
EQT266	CNTLVENT 553, 2 nd Stage Heavy Gas Reactor Swap/Catalyst Change Out																	
EQT267	CNTLVENT 9, 1 st Stage Reactor Swap/Catalyst Change out																	
EQT268	CNTLVENT 699, Leakage P-5452																	1
EQT269	CNTLVENT 700, Leakage P-5409																	1
EQT270	CNTLVENT 701, Leakage P-5408																	1
EQT271	CNTLVENT 702, Leakage P-5453																	1
EQT272	CNTLVENT 703, Leakage P-6028																	1
EQT273	CNTLVENT 704, Leakage P-5420																	1
EQT274	CNTLVENT 706, Column Reflux Drum PV-1065A Ethane Purge																	
EQT275	CNTLVENT 707, Column Reflux Drum PV-1065A Propane Purge																	
FUG009	3005-95, Fugitive Emissions															1		2

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this type of emission source.
 Blank - The regulations clearly do not apply to this type of emission source.

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Gasoline Hydrotreater Unit
Agency Interest No.: 263336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
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Norco, St. Charles Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR					
		A	Da	J	K	Ka/Kb	XX	YY	3Gs	3Ns	3Qs	A	J	M	V	FF	A	F	5Gs	CC	UUU	SDs	68	82	
UNF004	Gasoline Hydrotreater Unit	1							1			1	1	1	1	1	1	1	1	1	1	1	1	1	
ARE004	3205-95, Wastewater Emission																								
EQT252	3-95, EFR Storage Tank F-495																								
EQT253	1001-95, IFR Storage Tank F-491																								
EQT254	1002-95, EFR Storage Tank F-509																								
EQT255	1233-95, EFR Storage Tank F-503																								
EQT256	1252-95, EFR Storage Tank F-502																								
EQT257	5040-09, GHT Tank Turnaround Emissions																								
EQT258	CNTL VENT 27, Aromatic Splitter Vent																								
EQT259	CNTL VENT 380, Feed Surge Drum Vent PV-2031																								
EQT260	CNTL VENT 382, SW Drum Vent PV-2055																								

Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 61												40 CFR		
		A	Da	J	K	Ka/Kb	XX	YY	3Gs	3Ns	3Qs	A	J	M	V	FF	A	F	5Gs	CC	UUU	5Ds	68	82				
EQT261	CNTL VENT 386, Compressors Vent (Aromatic) K-5432A&B																											
EQT262	CNTL VENT 424, Compressors 1 st Stage Vent K-5431A&B																											
EQT263	CNTL VENT Compressors Vent (Heavy Gasoline) K-5432A&B)																											
EQT264	CNTL VENT 541, Miscellaneous Maintenance																											
EQT265	CNTL VENT 552, 2 nd Stage Aromatic Reactor Swap/Catalyst Change																											
EQT266	CNTL VENT 553, 2 nd Stage Heavy Gas Reactor Swap/Catalyst Change																											
EQT267	CNTL VENT 9, 1 st Stage Reactor Swap/Catalyst Change out																											
EQT268	CNTL VENT 699, Leakage P-5452																											
EQT269	CNTL VENT 700, Leakage P-5409																											

Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61					40 CFR 63 NESHAP					40 CFR		
		A	Da	J	K	Ka/Kb	XX	YY	3Gs	3Ns	3Qs	A	J	M	V	FF	A	F	5Gs	CC	UUU	5Ds	68	82
EQT270	CNTL VENT 701, Leakage P-5408									1												2		
EQT271	CNTL VENT 702, Leakage P-5453									1												2		
EQT272	CNTL VENT 703, Leakage P-6028									1												2		
EQT273	CNTL VENT 704, Leakage P-5420									1												2		
EQT274	CNTL VENT 706, Column Reflux Drum PV-1065A Ethane Purge									1												1		
EQT275	CNTL VENT 707, Column Reflux Drum PV-1065A Propane Purge									1												1		
FUG009	3005-95, Fugitive Emissions									1		1	1	1	1							1		

Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61					40 CFR 63 NESHAP					40 CFR				
		A	Da	J	K	Ka/Kb	XX	YY	3Gs	3Ns	3Qs	A	J	M	V	FF	A	F	5Gs	CC	UUU	5Ds	68	82		

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

Shell Chemical LP - Norco Chemical Plant - East Site
Gasoline Hydrotreater Unit
Agency Interest No.: 26336
Shell Chemical LP
Norco, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT259 CNTLVENT 380, Feed Surge Drum Vent PV-2031	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115.H.1.c or d	EXEMPT: Waste gas stream having a combined weight of VOCs less than 100 lb in any continuous 24-hr period or concentration less than 30,000 ppm
EQT261, 262 and 263 CNTLVENT 386, 424, and 555 Compressors Vents	Control of Emissions of Organic Compounds – Fugitive Emission Control LAC 33:III.2121.C.4.e	EXEMPT: Emissions routed to a control device, Flare FG-101, Emission Point 7-84
EQT268 thru EQT273 CNTLVENT 699, thru 704 Leakage	NESHAP, Subpart CC – NESHAP From Petroleum Refineries 40 CFR 63.648	EXEMPT: Emissions routed to a control device, Flare FG-101, Emission Point 7-84
FUG009 3005-95, GHT Fugitive Emissions	Control of Emissions of Organic Compounds – Fugitive Emission Control LAC 33:III.2121.C.5	EXEMPT: Complies a federal requirements having a higher degree of controls; NESHAP, 40 CFR 63, Subpart CC

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information

AI ID: 26336 Shell Chemical LP - Norco Chemical Plant - East Site
Activity Number: PER20090003
Permit Number: 3078-V0
Air - Title V Regular Permit Initial

Also Known As:	ID	Name	User Group	Start Date
	2520-00079	Shell Chemical LP - Norco Chemical Plant - East Site	CDS Number	08-12-1996
	13-1299890	Shell Norco Chemical Plant - East Site	Federal Tax ID	11-21-1999
LAR000011635		Shell Norco Chemical Plant East Site	Hazardous Waste Notification	03-14-1996
LA0109606	LPDES #	LPDES Permit #	LPDES Permit #	06-25-2003
	SCOGI LA Holdings LLC	Multimedia	Multimedia	08-12-1996
	Shell Chemical Co Norco East Site	Multimedia	Multimedia	08-05-2002
	Priority 1 Emergency Site	Priority 1 Emergency Site	Priority 1 Emergency Site	07-19-2006
LA-2176-L02	Radioactive Material License	Radiation License Number	Radiation License Number	09-20-2000
G-089-8206	SW Generator ID #	Solid Waste Facility No.	Solid Waste Facility No.	11-21-1999
38783	Shell Chemical LP - Shell Norco Chemical Plant	TEMPO Merge	TEMPO Merge	05-17-2001
52275	Shell Oil Co	TEMPO Merge	TEMPO Merge	02-21-2001
70079SHLLL1205R	TRI #	Toxic Release Inventory	Toxic Release Inventory	07-19-2004
Physical Location:			Main FAX:	5044656360
Mailing Address:			Main Phone:	5044657609
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Nora Ashby	PO Box 10 Norco, LA 700790010	5044656594 (WP)	Radiation Contact For
	Linda Bartlett	PO Box 10 Norco, LA 70079		Asbestos Contact for
	Hermie Bundick	15536 River Rd Norco, LA 700790010	5044656837 (WP)	Responsible Official for
	Hermie Bundick	15536 River Rd Norco, LA 700790010	hermie.bundick@shc	Responsible Official for
	Andrew Englands	PO Box 10 Norco, LA 700790010	5044657011 (WP)	Water Billing Party for
	Andrew Englands	PO Box 10 Norco, LA 700790010	ANDREW.ENGLAND@	Water Billing Party for
	Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Haz. Waste Billing Party for
	Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Hazardous Waste Permit Contact For
	Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Solid Waste Billing Party for
	Eric McKee	PO Box 10 Norco, LA 700790010	5044657313 (WP)	Emission Inventory Contact for
	Eric McKee	PO Box 10 Norco, LA 700790010	ERIC.MCKEE@SHE	Emission Inventory Contact for
	A. W Pearce	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Water Permit Contact For
	A. W Pearce	PO Box 10 Norco, LA 700790010	5044656729 (WF)	Water Permit Contact For
	Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Radiation License Billing Party for
	Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044656729 (WF)	Radiation License Billing Party for
	Quivoia Robinson	PO Box 10 Norco, LA 700790010	5044657997 (WP)	Accident Prevention Billing Party for

General Information

AI ID: 26336 Shell Chemical LP - Norco Chemical Plant - East Site
 Activity Number: PER20090003
 Permit Number: 3078-V0
 Air - Title V Regular Permit Initial

Related People:		Mailing Address	Phone (Type)	Relationship
Quivoja Robinson		PO Box 10 Norco, LA 700790010	5044656729 (WF)	Accident Prevention Billing Party for
Quivoja Robinson		PO Box 10 Norco, LA 700790010	5044656729 (WF)	Accident Prevention Contact for
Quivoja Robinson		PO Box 10 Norco, LA 700790010	5044657997 (WP)	Accident Prevention Contact for
Glenda Simon		PO Box 10 Norco, LA 700790010	5044657690 (WP)	Air Billing Contact for
Carol Triebel		520 Broadway Minden, LA 71055	3183714252 (WP)	Katrina Response Contact for
Carol Triebel		520 Broadway Minden, LA 71055	3183714252 (WP)	Responsible Official for
Joe Tudor		PO Box 10 Norco, LA 700790010	5044656350 (WP)	Radiation Safety Officer for
Joe Tudor		PO Box 10 Norco, LA 700790010	5044657117 (WF)	Radiation Safety Officer for
Joe Tudor		PO Box 10 Norco, LA 700790010	5043907235 (CP)	Radiation Safety Officer for
Joe Tudor		PO Box 10 Norco, LA 700790010	JOE.TUDOR@SHEI	Radiation Safety Officer for
D Frank Willson		15536 River Rd Norco, LA 700790010	5044657222 (WP)	Responsible Official for
Related Organizations:		Address	Phone (Type)	Relationship
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Operates
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Operates
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Owns
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Owns
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Radiation Registration Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Radiation Registration Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Emission Inventory Billing Party
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Air Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Haz. Waste Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Haz. Waste Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Radiation License Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044656360 (WF)	Radiation License Billing Party for
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Emission Inventory Billing Party
Shell Chemical LP		PO Box 10 Norco, LA 700790010	5044657313 (WP)	Air Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 26336 - Shell Chemical LP - Norco Chemical Plant - East Site
 Activity Number: PER20090003
 Permit Number: 3078-V0
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Gasoline Hydrotreater Unit						
ARE 0004	3205-95 - GHT Unit Wastewater Emissions				Transferred from Olefins Permit No. 2520-V3	8760 hr/yr
EQT 0252	3-95 - External Floating Roof Storage Tank F-495	6.02 million gallons	12.41 MM bbl/yr		Transferred from Olefins Permit No. 2520-V3	8760 hr/yr
EQT 0253	1001-95 - Internal Floating Roof Storage Tank F-491	7.61 million gallons	2.92 MM bbl/yr		Transferred from Pygas Permit No. 2840-V0	8760 hr/yr
EQT 0254	1002-95 - External Floating Roof Storage Tank F-509	4.61 million gallons	12.41 MM bbl/yr		Transferred from Pygas Permit No. 2840-V0	8760 hr/yr
EQT 0255	1233-95 - External Floating Roof Storage Tank F-503	6.32 million gallons	12.41 MM bbl/yr		EFR - Transferred from Logistics I Permit No. 2510-V1	8760 hr/yr
EQT 0256	1252-95 - External Floating Roof Storage Tank F-502	12.65 million gallons	12.41 MM bbl/yr		EFR - Transferred from Olefins Permit No. 2520-V3	8760 hr/yr
EQT 0257	5040-09 - GHT Tank Turnaround Emissions				(None Specified)	(None Specified)
EQT 0258	CNTLVENT 27 - GHT Aromatic Splitter Vent				(None Specified)	(None Specified)
EQT 0259	CNTLVENT 380 - GHT Feed Surge Drum Vent PV-2031				(None Specified)	(None Specified)
EQT 0260	CNTLVENT 382 - GHT SW Drum Vent PV-2055				(None Specified)	(None Specified)
EQT 0261	CNTLVENT 386 - GHT Compressors Vent (Aromatic) K-5432A&B				(None Specified)	(None Specified)
EQT 0262	CNTLVENT 424 - GHT Compressors 1st Stage Vent K-5431A&B				(None Specified)	(None Specified)
EQT 0263	CNTLVENT 555 - GHT Compressors Vent (Heavy Gasoline) K-5432A&B				(None Specified)	(None Specified)
EQT 0264	CNTLVENT 541 - GHT Miscellaneous Maintenance				(None Specified)	(None Specified)
EQT 0265	CNTLVENT 552 - GHT 2nd Stage Aromatic Reactor Swap/Catalyst Change Out				(None Specified)	(None Specified)
EQT 0266	CNTLVENT 553 - GHT 2nd Stage Heavy Gas Reactor Swap/Catalyst Change Out				(None Specified)	(None Specified)
EQT 0267	CNTLVENT 9 - GHT 1st Stage Ractor Swap/Catalyst Change Out				(None Specified)	(None Specified)
EQT 0268	CNTLVENT 699 - GHT P-5452 Leakage				(None Specified)	(None Specified)

INVENTORIES

All ID: 26336 - Shell Chemical LP - Norco Chemical Plant - East Site
 Activity Number: PER20090003
 Permit Number: 3078-V0
 Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Gasoline Hydrotreater Unit						
EQT 0269	CNTLVENT 700 - GHT P-5409 Leakage				Secondary Control Flare 6-84 (FE-101)	
EQT 0270	CNTLVENT 701 - GHT P-5408 Leakage				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
EQT 0271	CNTLVENT 702 - GHT P-5453 Leakage				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
EQT 0272	CNTLVENT 703 - GHT P-6028 Leakage				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
EQT 0273	CNTLVENT 704 - GHT P-5420 Leakage				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
EQT 0274	CNTLVENT 706 - GHT Column Reflux Drum PV-1065A Ethane Purge				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
EQT 0275	CNTLVENT 707 - GHT Column Reflux Drum PV-1065A Propane Purge				Routed to Flare 7-84 (FG-101), Secondary Control Flare 6-84 (FE-101)	(None Specified)
FUG 0009	3005-95 - GHT Fugitive Emissions				Transferred from Olefins Permit No. 2520-V3	8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Gasoline Hydrotreater Unit							
EQT 0252	3-95 - External Floating Roof Storage Tank F-495	160		40			
EQT 0253	1001-95 - Internal Floating Roof Storage Tank F-491	180		40			
EQT 0254	1002-95 - External Floating Roof Storage Tank F-509	140		40			
EQT 0255	1233-95 - External Floating Roof Storage Tank F-503	164		40			
EQT 0256	1252-95 - External Floating Roof Storage Tank F-502	232		40			

Relationships:

INVENTORIES

AI ID: 26336 - Shell Chemical LP - Norco Chemical Plant - East Site
 Activity Number: PER20090003
 Permit Number: 3078-V0
 Air - Title V Regular Permit Minor Mod

Subject Item Groups:

ID	Group Type	Group Description
SCN 0001	Alternate Operating Scenario	PreGHT - Pre GHT Project Tanks Emissions
SCN 0002	Alternate Operating Scenario	PreGHTFUG - Pre GHT Fugitive Emissions
UNF 0004	Unit or Facility Wide	GHT - Gasoline Hydrotreater Unit

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0720	0720 Petroleum Refining (Rated Capacity)	1	M bbl/day

SIC Codes:

2911	Petroleum refining	UNF 004
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 26336 - Shell Chemical LP - Norco Chemical Plant - East Site

Activity Number: PER20090003

Permit Number: 3078-V0

Air - Title V Regular Permit Minor Mod

Subject Item	VOC	Avg lb/hr	Tons/Year
Gasoline Hydrotreater Unit			
ARE 0004 3205-95	4.42	19.37	
EQT 0252 3-95	1.77	7.77	
EQT 0253 1001-95	2.69	11.79	
EQT 0254 1002-95	1.63	7.14	
EQT 0255 1233-95	1.99	8.70	
EQT 0256 1252-95	2.70	11.83	
EQT 0257 5040-09	4.70	20.57	
FUG 0009 3005-95	9.89	43.31	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.